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**From:** Smalley, Bryant [smalley.bryant@epa.gov]  
**Sent:** 3/20/2019 1:57:35 AM  
**To:** Assunto, Carmen [Assunto.Carmen@epa.gov]; Crossland, Ronnie [Crossland.Ronnie@epa.gov]; Smith, Monica [smith.monica@epa.gov]; Mason, Steve [mason.steve@epa.gov]; Loesel, Matthew [loesel.matthew@epa.gov]; Adams, Adam [Adams.Adam@epa.gov]  
**CC:** Snowbarger, Robert [Snowbarger.Robert@epa.gov]  
**Subject:** RE: Press Inquiry from KHOU deadline today

Hi Carmen – Here is a combined answer:

There is no age limit or lifespan defined in the regulations on either aboveground storage tanks (ASTs) or underground storage tanks (USTs), as long as they are maintained in accordance with tank specific Industry Standard (such as API or STI or UL). The document Ms. Macias is referring to is a HQ Spill Prevention Control & Countermeasure (SPCC) Guidances document. The overall document provides guidance to and is written for EPA Inspectors. However, the Chapter Ms. Macias is referencing is discussing inspections that an SPCC subject facility would have to do, or have done, by a Tank Inspector knowledgeable in the applicable standards. These Inspectors can be company employees, or contractors. SPCC Regulations require subject facilities to follow industry accepted standards, mentioned above, to inspect & maintain their storage tanks. For USTs specifically, older tanks must have Corrosion Protection (CP) that is checked regularly and inspected by a certified corrosion expert. In Texas, regulated UST sites are inspected by the TCEQ and covered under 30 TAC Chapter 334.

Bryant Smalley  
Oil Spill & Response Team Leader  
USEPA R6  
214-665-7368

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**From:** Assunto, Carmen  
**Sent:** Tuesday, March 19, 2019 2:39 PM  
**To:** Crossland, Ronnie <Crossland.Ronnie@epa.gov>; Smalley, Bryant <smalley.bryant@epa.gov>; Smith, Monica <smith.monica@epa.gov>; Mason, Steve <mason.steve@epa.gov>; Loesel, Matthew <loesel.matthew@epa.gov>; Adams, Adam <Adams.Adam@epa.gov>  
**Subject:** FW: Press Inquiry from KHOU deadline today

I need help with this media inquiry. Do you recommend an answer or a different contact to write? Thank you, Carmen

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**From:** Gray, David  
**Sent:** Tuesday, March 19, 2019 1:52 PM  
**To:** Macias, Tina <tmacias@khoul.com>; Assunto, Carmen <Assunto.Carmen@epa.gov>  
**Subject:** RE: Press Inquiry from KHOU deadline today

Adding our PIO Carmen Assunto.

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**From:** Macias, Tina <tmacias@khoul.com>  
**Sent:** Tuesday, March 19, 2019 1:49 PM  
**To:** Gray, David <gray.david@epa.gov>  
**Subject:** Press Inquiry from KHOU deadline today

Good afternoon David,

In light of the tank fire in La Porte, I'm trying to make sense of tank inspection guidelines found here:

[https://www.epa.gov/sites/production/files/2014-04/documents/7\\_inspectionsevaluation\\_testing\\_2014.pdf](https://www.epa.gov/sites/production/files/2014-04/documents/7_inspectionsevaluation_testing_2014.pdf) Can you answer a couple questions for me:

1. Is there a recommended age/lifetime of an aboveground storage tank? Same question for underground storage tanks.
2. This document refers to regional inspectors. Who inspects the tanks – trained personnel in the company, an outside company, EPA personnel or someone else?

Thanks,  
Tina

Tina Macias  
Investigative Producer



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